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19 *Attorneys for Defendant*
20 *Walmart, Inc.*

21 **UNITED STATES DISTRICT COURT**

22 **DISTRICT OF NEVADA**

23 SYLVIA LEYS, Plaintiff,

24 v.

25 WAL-MART STORES, INC., dba WALMART
26 STORE #4356 a foreign
27 corporation; DOE EMPLOYEE; DOES I
28 through XXX, inclusive and ROE
through XXX, inclusive,
BUSINESS ENTITIES I through XXX,
inclusive,

Defendants.

Case No.: 2:17-cv-02196-APG-VCF

STIPULATION AND [PROPOSED]
ORDER TO EXTEND DISCOVERY
DEADLINES

[THIRD REQUEST]

29 Plaintiff Sylvia Leys, (hereinafter "Plaintiff") and Defendant WALMART, INC. (hereinafter
30 "WALMART" or "Defendant"), by and through their respective counsels of record, do hereby

1 stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this
2 matter for a period of one hundred twenty (120) days for the reasons explained herein.

3 Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the third such discovery
4 extension requested in this matter.

5 **DISCOVERY COMPLETED TO DATE**

6

7 • The parties have conducted an FRCP 26(f) conference and have served their respective FRCP
8 26(a) disclosures;

9 **DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF**

10 **DISCOVERY**

11 Discovery to be completed includes:

12

13 • Plaintiff's and Defendant's additional Written Discovery request(s);

14 • Deposition of Plaintiff (currently scheduled for June 15, 2018);

15 • Deposition of Plaintiff's and Defendant's Experts;

16 • Deposition of Plaintiff's treating physicians;

17 • Deposition of Defendant 30(b)(6) witness;

18 • Defendant is still in the process of subpoenaing Plaintiff's medical records;

19 • Inspection of the subject premises (if necessary).

20 The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested
21 extension. The parties agree that, pending this Court's approval, extension of remaining discovery
22 deadlines is appropriate, as Defendant's and Plaintiff's are still in the process of obtaining Plaintiff's
23 medical records. Further, the parties wish to continue to investigate this case by conducting additional
24 important depositions, which may advance the potential for pre-trial resolution of this matter without
the need for incurring fees and costs associated with trial preparations.

25 **[PROPOSED] NEW DISCOVERY DEADLINES**

26 **Discovery Cut-Off Date** **November 12, 2018**

27 **Dispositive Motion Deadline** **December 11, 2018**

28 Joint Pretrial Order due January 10, 2019 If dispositive motions are filed, the deadline
for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive
motions or further court order.

1 If this extension is granted, all anticipated additional discovery should be concluded within the
2 stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is
3 made by the parties in good faith and not for the purpose of delay.

4

5 DATED this 14th day of June, 2018.

6

7 DATED this 14th day of June, 2018.

8

9 */s/ Ramzy P. Lada*

10 _____
11 Ramzy P. Lada, Esq.
12 Nevada Bar No. 11405
13 LADAH LAW FIRM
14 517 S. Third Street
15 Las Vegas, NV 89101
16 *Attorneys for Plaintiff*

17 */s/ Tracee Duthie*

18 _____
19 Tracee Duthie, Esq.
20 Nevada Bar No. 8795
21 PHILLIPS SPALLAS & ANGSTADT
22 504 South Ninth Street
23 Las Vegas, Nevada 89101

24

25 *Attorneys for Defendant*
26 *Walmart, Inc.*

27

28 DATED this 14th day of June, 2018.

29

30 */s/ Charles Abbott*

31 _____
32 Charles Abbott (SBN 13811)
33 **Law Offices of Charles Abbott, PC**
34 Ronald H. Reynolds (SBN 827)
35 Harrison J. Reynolds (SBN 13748)
36 **Reynolds & Associates**
37 823 Las Vegas Boulevard, S. Suite 280
38 Las Vegas, Nevada 89101

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40 *Attorneys for Defendant*
41 *Walmart, Inc.*

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43 **IT IS SO ORDERED:**

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47 _____
48 **UNITED STATES MAGISTRATE JUDGE**

49

50 6-19-2018

51

52 **DATED:** _____

CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5, I hereby certify that I am an employee of the law firm PHILLIPS, SPALLAS & ANGSTADT, LLC, and that on this 14th day of June, 2018, I electronically served a copy of **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES** **[THIRD REQUEST]** as follows:

- By facsimile addressed to the following counsel of record, at the address listed below;
- By placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- By Hand Delivery (ROC); and/or
- By Electronic Service through CM/ECF to:

ATTORNEY OF RECORD	TELEPHONE/FAX	PARTY
RAMZY P. LADAH ESQ. Nevada Bar No. 11405	Phone 702-252-0055	Plaintiff
LADAH LAW FIRM 517 S. Third Street Las Vegas, NV 89101 ramzy@ladahlaw.com	Fax 702-248-0055	
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An Employee of PHILLIPS, SPALLAS & ANGSTADT LLC